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7 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,	)	No. CR 00-0505 (WHA)
12	)	
13 Plaintiff,	)	STIPULATION AND
14 v.	)	<del>PROPOSED</del> ORDER
15 CHARLES W. McCALL, Jr.,	)	EXTENDING TIME TO RESPOND
16 Defendant.	)	TO DEFENDANT'S MOTION
	)	PURSUANT TO 28 U.S.C. § 2255

17  
18 WHEREAS, on or about June 18, 2013, the defendant moved to vacate his sentence  
19 pursuant to 28 U.S.C. § 2255.

20 WHEREAS, on or about June 24, 2013, the Court ordered the government to show cause  
21 within "sixty days" or by August 24, 2013 why the motion should not be granted.

22 WHEREAS, undersigned counsel for the government has been scheduled to try two other  
23 cases that are related to a long-standing insider trading investigation beginning August 26, 2013  
24 (*United States v. Bayyouk*, Case No. CR 12-0420 EMC) and beginning September 16, 2013  
25 (*United States v. Salman*, Case No. CR 11-0625 EMC) and anticipates that he will be fully  
26 engaged in these trials through at least October 4, 2013.

27 WHEREAS, counsel for the government therefore requests an adjournment of the

28 STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME TO RESPOND TO  
DEFENDANT'S MOTION PURSUANT TO 28 U.S.C. § 2255, CASE NO. CR 00-0505 (WHA)

1 government's time to answer the defendant's pending motion until October 24, 2013.

2 WHEREAS, counsel for the defendant consents to an adjournment until only September  
3 24, 2013 but will not consent to an adjournment until October 24, 2013.

4 STIPULATED AND AGREED TO:

5 DATED: August 9, 2013

MELINDA HAAG  
United States Attorney

6 /s/  
7 \_\_\_\_\_

8 Adam A. Reeves  
9 Assistant United States Attorney

10 DATED: August 9, 2013

11 /s/  
12 \_\_\_\_\_

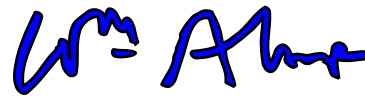
13 William L. Osterhoudt, Esq.  
14 Law Offices of William L. Osterhoudt  
15 Counsel for Defendant

16  
17 **ORDER**

18 **PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN,**

19 **IT IS SO ORDERED THAT** the government's time to respond to the defendant's  
20 motion to vacate pursuant to 28 U.S.C. § 2255 shall be extended until October 24, 2013.

21  
22 Dated: August 14, 2013



23 Hon. William H. Alsup  
24 United States District Judge  
25 Northern District of California  
26  
27

28 STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME TO RESPOND TO  
DEFENDANT'S MOTION PURSUANT TO 28 U.S.C. § 2255, CASE NO. CR 00-0505 (WHA)